



AMERICAN
PSYCHOLOGICAL
ASSOCIATION

DOCKET FILE COPY ORIGINAL

RECEIVED

APR 8 1997

Federal Communications Commission
Office of Secretary

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

IN THE MATTER OF
INDUSTRY PROPOSAL FOR RATING
VIDEO PROGRAMMING
CS DOCKET NO. 97-55

COMMENTS FOR
THE AMERICAN PSYCHOLOGICAL ASSOCIATION

APRIL 8, 1997

CONTACT:
JEFF MCINTYRE
AMERICAN PSYCHOLOGICAL ASSOCIATION
750 FIRST STREET, NE
WASHINGTON, DC 20002-4242
202-336-6064

750 First Street, NE
Washington, DC 20002-4242
(202) 336-5500
(202) 336-6123 TDD

No. of Copies rec'd
List ABCDE

0+7

Web: www.apa.org

The American Psychological Association, an organization of over 151,000 members and affiliates, represents the vast array of social and behavioral research that has been done on the effects of television on children. Our members have a long history of research on child development and the effects of television viewing on children's behavior. We share the concerns of parents, educators, child advocates and others who disagree with the creation of an age based television ratings system. **The APA urges the Federal Communications Commission to reject the age based TV Parental Guidelines as proposed by the Television Ratings Implementation Group.**

AGE VS CONTENT

As psychologists, we know that repeated exposure to violent programming by children leads to the removal of their inhibitions about violence, models aggressive behavior that children may imitate, teaches anti-social means of resolving conflicts and dealing with frustration, as well as many other potentially negative consequences. Parents have a demonstrated need to have actual information about television programming so they can control their children's viewing habits.

The APA favors a content based TV Ratings System to work in conjunction with the violence chip to give parents information about their children's television viewing. A content-based ratings system will allow parents to make viewing choices based upon specific information, not upon broad age groups determined by television executives. Without specific research driven information, such that a content based system would provide, television ratings will exist as a set of assumptions television industry executives will make about what is suitable

for our children.

Through a vague age based system, parents will be put at a disadvantage in making decisions about programming content. The age based system pre-determines suitability for children based on a single judgement by television industry executives. Parents will have no way of knowing why a program has achieved its rating.

Through the use of an age based system, parents will lack descriptive information about violence, language, or sex in a program, and therefore are powerless to determine the suitability of TV programming for their children. With actual information about the levels of violence, sex, or bad language, parents can make educated decisions about television programming.

RESEARCH ON VIEWING VIOLENCE

Hundreds of studies conducted over several decades have led organizations such as the American Psychological Association, the American Medical Association, the National Academy of Sciences, the Centers for Disease Control and Prevention, the U.S. Surgeon General and others to conclude that exposure to televised portrayals of violence has a real and important effect on the development of aggressive attitudes and behaviors, especially for children. Those working in this field typically describe three types of effects:

- Viewers learn specific forms of aggression and acquire values and attitudes supportive of aggression from televised violence. The media have typically focused on incidents where viewers have apparently imitated violent acts viewed on television, but the more common and insidious effects are those that shape attitudes and values with respect to the acceptability of

violence as a means of solving disputes.

- Viewers of televised violence come to believe that the world is a more dangerous place than it really is. That is, they develop an exaggerated sense of fear in response to what they view. This effect holds particularly true for children and the elderly.
- Viewers of televised violence may, over time, become desensitized to real life violence and its consequences. They become more callous to the victims of real-world violence.

It is important to recognize that these three effects can be exacerbated or diminished by the manner in which violence is portrayed. Contextual features surrounding the portrayals have important effects on the degree of risk created by televised violence.

For example, when presentations of violence are rewarded or not penalized, are carried out by an attractive character such as a hero, are portrayed as humorous, are presented as a reasonable response to a situation, and/or are not portrayed as having long-term consequences for the victim or perpetrator, they can lead to greater learning, fear and desensitization. Overly graphic portrayals of violence can heighten both fear responses and desensitization. On the other hand, violence which is followed by negative consequences for the perpetrator or shown as having realistic consequences, both short- and long-term, can actually teach anti-violence behaviors and attitudes. Television violence per se is not the problem; rather, it's the manner in which most violence on television is shown that should concern us.

Recent research conducted at the University of California at Santa Barbara demonstrates

that violence is commonplace on television, and that most of the portrayals present violence in those ways likely to facilitate the learning of aggressive behaviors and attitudes, increase desensitization to violence, and foster an exaggerated fear of violence.

Congress has taken action twice to address the growing concerns of the public about televised violence. First, in 1990 Congress passed an antitrust exemption in order to allow the television industry to jointly consider options for addressing the problem of television violence without fear of legal repercussions. Sensing a lack of response on the part of the industry, Congress recently amended the Telecommunications Act of 1934 to require that television sets sold in the U.S. be fitted with viewer discretion technology, known as the V-chip (with V standing for violence), which would allow parents to block out objectionable programming. In order for the V-chip to operate, a coding system is necessary to allow parents to select which programming to block. Responsibility for the development of this coding system was given to the television industry.

AGE BASED SYSTEM FLAWS

There is widespread belief among scholars and parents that the age based system the television industry has developed fails to meet the needs of children and parents and is inconsistent with Congress' intent in passing the V-chip legislation.

This new system is fundamentally flawed; it neither does what parents want it to do nor what Congress intended it to do. Parents cannot know, for example, whether a program rated TV-14 contains any violence whatsoever. With an aged-based rating system, a program might earn a TV-PG, TV-14, or TV-M rating on the basis of violence, sexual content, adult language,

or any combination of these three factors. The blending of different kinds of content in this rating system is interesting from the point of view of our empirical research. While we can safely claim that scientific research indicates that televised violence promotes negative developmental outcomes for our children, we cannot make similar claims with respect to exposure to sexual content or adult language. Certainly, these issues raise legitimate parental concerns, but we cannot claim, on scientific grounds, that they represent a public health concern in the same manner or of the same magnitude that televised violence does. Without a content based ratings system, parents cannot filter out the specific programming that poses a proven public health concern. Parents and policy makers have been concerned about televised violence for decades, yet those concerns are lost in this new rating system. The "V" has vanished.

Another flaw in this aged-based system is that it presumes uniformity in the types of television content children of a certain age are mature enough to deal with. Children mature at different rates and have different psychological makeups which may make them more or less sensitive to different types of television content. Parents know best the types of content their children can positively manage. This system, however, simply draws age-based lines and suggests to parents that some unspecified content in a program will be objectionable or problematic. It does not provide the information to allow parents to make reasoned judgments based on their knowledge of their own children's maturity level.

RECENT RESEARCH ON AGE BASED RATINGS

The TV Parental Guidelines do not convey critical content information. The new ratings do not provide the information about program content that parents need in order to limit their

child's access to programs they consider harmful. Surveys indicate that different parents feel differently about the impact of televised violence vs. sex vs. language on their children. If the highly similar MPAA ratings are any indication, a rating such as "TV-PG" will not give parents advance notice of the type of content to expect in a program. The APA has analyzed data from the National Television Violence Study, which includes the largest and most representative sample of television programming ever collected, to explore the proportion of movies rated "PG" that contained different types of content affixed by the channel showing them. In this analysis, 22% of the "PG" rated movies had neither sex nor violence, but only adult language. Another 22% had language and sex, and 28% had language and violence. This diversity of content in "PG" rated movies suggests that the content of a program rated "TV-PG" will be totally unpredictable. Parents will not have information on whether it contains content they consider harmful.

The television producer who rates his own program will have to utilize this content information in order to arrive at a rating. However, the Industry Group is adamant about not disclosing this information for individual shows. Thus, for a "TV-14" program, the warning states "This program **may** contain sophisticated themes, sexual content, strong language, and more intense violence." Implicit in this statement is "This programming **may not** contain sophisticated themes, sexual content, strong language, and more intense violence." How are parents to distinguish among content they find objectionable based on this type of ratings system?

Based on research done at the University of Wisconsin - Madison, the TV Parental Guidelines are expected to increase, rather than reduce children's exposure to harmful programming. In research conducted for Year 1 of the National Television Violence Study, the

MPAA ratings of "PG-13: Parents Strongly Cautioned," and "R: Restricted" made many children eager to see a movie and the "G: General Audiences" rating made them stay away. In contrast, the advisory "contains some violent content" did not make children more interested in a program. Other research done at Iowa State University (which was completed independently of the University of Wisconsin - Madison Study), confirms that restrictive warning labels attract viewers but that content information does not. The recent findings of the Year 2 study of the National Television Violence Study echo the power of the "enticement" of age based ratings.

POLICY RECOMMENDATIONS

- **The ratings system should include specific categories of content such as violence, sex, and language instead of simply designating the age appropriateness of the programming.**

A system based exclusively on age categories fails to give parents the information they need to make healthy viewing decisions for their children. Parental values and children vary widely. One parent may find adult language especially offensive, another may object to violence, and a third may be concerned with sexual content. If the system is based exclusively on age, it dictates to the family what is appropriate rather than offering a range of information on which to base their viewing decisions. By incorporating simple categories of content, the television ratings system can empower parents to make informed decisions based on their values of what is appropriate for their children.

- **The ratings given to television programs watched by children should be based on scientific information available from the study of child development rather than on**

television executives perceptions of parental norms.

By basing the ratings system on specific determinations of what is harmful to the child instead of what is offensive to parents, the ratings can focus on what the science proves causes risks while artistic freedom is guaranteed against shifting standards.

- **The rating process should allow for the direct participation of parents and child development experts from outside the television industry.**

Currently, there is no place for parents to have a direct role in determining the rating of a given show. Those with the interests of children have no say in determining a program's rating, commenting on an appeal of that rating, or having a voice elsewhere in the overall ratings process.

CONCLUSION

The American Psychological Association urges the Federal Communications Commission to reject the Television Industry Group's proposed TV Parental Guidelines. We urge the television industry to support the use of accurate, informative, and objective labeling of television programs to help parents make healthy choices about their children's viewing habits. These labels must be based on sound scientific data and research into the nature of violent acts on television. To that end, the APA urges the television industry to include parents and child development experts in the ratings process and to utilize the available psychological and behavioral research to establish a framework for a rating system that provides clear and specific information about program content.